

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

<b>IN RE:</b>  <b>HOT CRETE, LLC,</b>  <b>Debtor.</b>	§ § § § § §	<b>Case No. 24-10303-smr</b>  <b>Chapter 11</b>
---	----------------------------	---

---

**DEBTOR’S AMENDED WITNESS AND EXHIBIT LIST FOR HEARING ON  
APPROVAL OF DEBTOR’S DISCLOSURE STATEMENT SET FOR  
THURSDAY, JUNE 5, 2025 AT 10:00 A.M. (CT)  
(Reference Docket No. 199)**

---

Hot Crete, LLC (the “Debtor”) reserves the right to call any or all of the following as witnesses at the hearing, including but not limited by affidavit, declaration, or proffer.

1. Any witness called or designated by any other party; and
2. Any rebuttal or impeachment witnesses, as appropriate.

The Debtor reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearing, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

No.	Exhibit	Offered	Admitted
D-1	Hot Crete, LLC's Disclosure Statement Under 11 U.S.C. §1125 (Docket No. 199)		
D-2	Exhibit A to Disclosure Statement – Liquidating Plan (Docket No. 199-1)		
D-3	Proposed Insurance Settlement		
D-4	Proposed Liquidation Trust Agreement		
D-5	Proposed Draft Disclosure Statement with Redlines (6.2.2025)		
D-6	Proposed Draft Plan with Redlines (6.2.2025)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes.		
	All exhibits identified by or offered by any other party at the hearing.		

The Debtor reserves the right to supplement or amend the proposed exhibits as may be required. The Debtor further reserves the right to introduce any impeachment or rebuttal exhibit as may be required. The Debtor further reserves the right to call any witness introduced by any other party and to call any impeachment or rebuttal witness as may be required.

Dated: June 3, 2025

Respectfully submitted,

**HAYWARD PLLC**

By: /s/Todd Headden

Todd Headden

Texas State Bar No. 24096285

7600 Burnet Road, Suite 530

Austin, TX 78757

(737) 881-7100 (Phone/Fax)

theadden@haywardfirm.com

***Counsel for Hot Crete, LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on June 3, 2025, a true and correct copy of the foregoing without exhibits were served electronically to all parties receiving notice via the Court's CM/ECF system. Further, on June 3, 2025, or within one business day thereof, the foregoing was served without exhibits via United States First Class mail to the party listed below.

Hot Crete, LLC 2010 Brushy Creek Road, Unit A Cedar Park, TX 78613  <b><i>Debtor</i></b>	United States Trustee Attn: Gary W. Wright 903 San Jacinto Blvd., Suite 230 Austin, TX 78701  <b><i>United States Trustee</i></b>
Martin Marietta Materials, Inc. P.O. Box 677061 Dallas, TX 75267-7061  <b><i>Top 20 Unsecured Creditors</i></b>	Federated Mutual Insurance Company 9001 Airport Fwy., Suite 500 North Richland Hills, TX 76180  <b><i>Top 20 Unsecured Creditors</i></b>
Arcosa Aggregates Texas, LLC P.O. Box 911205 Dallas, TX 75373-1205  <b><i>Top 20 Unsecured Creditors</i></b>	Express Materials Services, LLC 556 S HWY-95 Elgin, TN 78621  <b><i>Top 20 Unsecured Creditors</i></b>
CEMEX Construction Materials South, LLC 10100 Katy Freeway, Ste 300 Houston, TX 77043-5267  <b><i>Top 20 Unsecured Creditors</i></b>	Chanas Aggregates, LLC 7850 E. State Hwy. 29 Llano, TX 78643  <b><i>Top 20 Unsecured Creditors</i></b>
Texas Lehigh Cement Company, LP P.O. Box 736821 Dallas, TX 75373-6821  <b><i>Top 20 Unsecured Creditors</i></b>	Capital One Spark Business P.O. Box 60519 City of Industry, CA 91716-0519  <b><i>Top 20 Unsecured Creditors</i></b>
Oscar Carreon 201 Lollipop Ln Cedar Park, TX 78613  <b><i>Top 20 Unsecured Creditors</i></b>	WEX Inc. 1 Hancock Drive Portland, ME 04101  <b><i>Top 20 Unsecured Creditors</i></b>

<p>Hillard Dozer, LP 12495 Reeds Lake Loop Temple, TX 76501</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>	<p>Texas Department of Transportation 12719 Burnet Road Austin, TN 78727</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>
<p>WW Air Compressor 402 Burleson St Smithville, TX 78957</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>	<p>Central Texas Regional Mobility Authority 3300 N IH-35, Suite 300 Austin, TX 78705</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>
<p>Hill Country Electric Supply 3003 N. E. LOOP 410, SUITE 101 San Antonio, TX 78218</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>	<p>Hasten Energy Solutions 405 N Post Oak Ln Houston, TX 77024-5913</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>
<p>Texas Enterprises. Inc. dba Allied Sales Company 5005 E 7th Street Austin, TX 78702</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>	<p>Fleetistics 1936 Bruce B Downs Blvd. #505 Wesley Chapel, FL 33544</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>
<p>Liberty Hill Truck Service 12830 TX-29 Liberty Hill, TX 78642</p> <p><b><i>Top 20 Unsecured Creditors</i></b></p>	<p>United States Trustee Program Attn: Jessica Lanoue Hazlik 615 E. Houston Street, Ste. 533 San Antonio, TX 78205</p> <p><b><i>Notice of Appearance for United States Trustee</i></b></p>
<p>McCreary, Veselka, Bragg, &amp; Allen, P.C. Attn: Julie Anne Parsons P.O. Box 1269 Round Rock, TX 78680-1269</p> <p><b><i>Notice of Appearance for The County of Williamson</i></b></p>	<p>Luttrell &amp; Carmody Law Group Attn: Leslie M. Luttrell &amp; Morris E. "Trey" White III &amp; Jessica A. Henry 100 N.E. Loop 410, Suite 615 San Antonio, TX 78216</p> <p><b><i>Notice of Appearances for Frost Bank</i></b></p>

<p>Padfield &amp; Stout, LLP Attn: Jessica N. Alt &amp; Matthew B. Fronda 420 Throckmorton Street, Suite 700 Fort Worth, TX 76102</p> <p><b><i>Notice of Appearances for Trans Lease, Inc.</i></b></p>	<p>Frank B. Lyon P.O. Box 50210 Austin, TX 78763</p> <p><b><i>Notice of Appearance for Cody Pools, Inc.</i></b></p>
<p>Chamberlain, Hrdlicka, White, Williams &amp; Aughtry, PC Attn: Tara T. LeDay 1200 Smith Street, Suite 1400 Houston, TX 77002</p> <p><b><i>Notice of Appearance for Rose Wheeler</i></b></p>	<p>Sprouse Law Firm Attn: Marvin E. Sprouse III 901 Mopac Expressway South Building 1, Suite 300 Austin, TX 78746</p> <p><b><i>Notice of Appearance for Kevin Wilson</i></b></p>
<p>Kane Russell Coleman Logan, PC Attn: Michael P. Ridulfo 5151 San Felipe, Suite 800 Houston, TX 77056</p> <p><b><i>Notice of Appearance for Jeremy &amp; Elizabeth Spicer</i></b></p>	<p>Holland &amp; Knight, LLP Attn: William R. "Trip" Nix 100 Congress Avenue, Suite 1800 Austin, TX 78701</p> <p><b><i>Notice of Appearance for James Murdock, Brad Wheeler, and Jason Nichol</i></b></p>
<p>Padfield &amp; Stout, LLP Attn: Christopher V. Arisco &amp; Ivan Escobar &amp; Jessica N. Alt 100 Throckmorton Street, Suite 700 Fort Worth, TX 76102</p> <p><b><i>Notice of Appearances for North Mill Credit Trust</i></b></p>	<p>Kye Law Group, P.C. Attn: Matthew F. Kye 201 Old Country Road, Suite 120 Melville, NY 11747</p> <p><b><i>Notice of Appearance for Sumitomo Mitsui Finance and Leasing Co., Ltd.</i></b></p>
<p>The Cronfel Firm Attn: Guillermo Ochoa-Cronfel 7500 Rialto Blvd., Bldg. 1, Suite 250 Austin, TX 78735</p> <p><b><i>Notice of Appearance for Doo Reid</i></b></p>	<p>VBPena Law, PLLC Attn: Abigail Ventress 406 N. Lee St., Ste. 103 Round Rock, TX 78664</p> <p><b><i>Notice of Appearance for Kathy &amp; Corey Westbrook/Westbrook Residential Pool</i></b></p>

<p>Spicewood Professional Offices Attn: B. Weldon Ponder, Jr. 4408 Spicewood Springs Road Austin, TX 78759</p> <p><b><i>Notice of Appearance for Pools by Blue Haven, Inc.</i></b></p>	<p>The Law Offices of Brian Cooper Guequierre Attn: Brian Guequierre 4315 Airport Blvd. Austin, TX 78722</p> <p><b><i>Notice of Appearance for Spark Root Construction, LLC</i></b></p>
<p>Dickinson Wright PLLC Attn: Stephanie E. Kaiser 607 W. 3<sup>rd</sup> Street, Suite 2500 Austin, TX 78701</p> <p><b><i>Notice of Appearance for Diego &amp; Elaine Suarez</i></b></p>	<p>Ross, Smith, &amp; Binford, PC Attn: Frances A. Smith Plaza of the Americas 700 N. Pearl St., Suite 1610 Dallas, TX 75201</p> <p><b><i>Notice of Appearance for Arcosa Aggregates Texas LLC</i></b></p>
<p>Cain &amp; Skarnulis PLLC Attn: Ryan E. Chapple &amp; Michael Moody &amp; Joshua A. Eames-Cepero 303 Colorado Street, Suite 2850 Austin, TX 78701</p> <p><b><i>Notice of Appearances for Donn Wurts, Jamie Wurts, Rowena Hernandez, Edward Weltens, Julie Weltens, Wade Landers, Patricia Landers, Melissa Jordan, Nick Russell, Jeffrey Szastak, Heather Szastak, Lewis (Brad) Warnock, and Amy Warnock</i></b></p>	<p>Offerman &amp; King, LLP Attn: James W. King 6410 Wellington Place Beaumont, TX 77706</p> <p><b><i>Notice of Appearance for Sumitomo Mitsui Finance and Leasing Co., Ltd.</i></b></p>
<p>D'Amura &amp; Zaidman, PLLC Attn: Lydia R. Zaidman 609 Josephine Street Austin, TX 78704</p> <p><b><i>Notice of Appearance for Ansar Chmeis</i></b></p>	<p>Kell C. Mercer, P.C. Attn: Kell C. Mercer 901 S. MoPac Expy., Bldg. 1, Suite 300 Austin, TX 78746</p> <p><b><i>Notice of Appearance for Julie Stivers and Daryl Elsea</i></b></p>

<p>The Roarty Law Firm, PLLC  Attn: Rekha Roarty &amp; Nicholl Wade &amp; Lex Townsley  1301 S Capital of Texas Hwy, Suite B-202  Austin, TX 78746</p> <p><b><i>Notice of Appearances for John Bretz</i></b></p>	<p>Barron &amp; Newburger, P.C.  Attn: Stephen W. Sather  7320 N. MoPac Expy., Suite 400  Austin, TX 78731</p> <p><b><i>Notice of Appearance for Rachel Mouton</i></b></p>
<p>Meltzer, Purtill &amp; Stelle, LLC  Attn: Timothy W. Brink  125 South Wacker Drive, Suite 2900  Chicago, IL 60606  tbrink@mpslaw.com</p> <p><b><i>Notice of Appearance for Amerisure Mutual Insurance Company</i></b></p>	<p>Spencer Fane LLP  Attn: David H. Timmins &amp; Eric M. Van Horn  2200 Ross Avenue, Suite 4800 West  Dallas, Texas 75201  dtimmins@spencerfane.com  ericvanhorn@spencerfane.com</p> <p><b><i>Notice of Appearance for Continental Insurance Company and National Fire Insurance of Hartford</i></b></p>
<p>Lovins Trosclair PLLC  Attn: Michael E. Lovins  1301 S. Capital of Texas Highway  Building A, Suite 136  Austin, Texas 78746  Michael@LovinsLaw.com</p> <p><b><i>Notice of Appearances for Dominic Van, Janell Gregerson, and Jennifer Johnson</i></b></p>	<p>Kane Russell Coleman Logan, P.C.  Attn: Stephanie E. Kaiser  901 Main Street, Suite 5200  Dallas, TX 75202  skaiser@krcl.com</p> <p><b><i>Notice of Appearance for Diego and Elaine Suarez</i></b></p>

/s/ Todd Headden  
Todd Headden